



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

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ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

May 13, 2024

**VIA ECF**

Application GRANTED. The Clerk is directed to terminate ECF No. 61.

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 1105  
New York, New York 10007

SO ORDERED.

May 13, 2024

Re: *Baptiste v. City University of New York, et al.*, 22-cv-02785 (JMF)

Dear Judge Furman:

This Office represents the Defendants in the above-referenced case. I write, with Plaintiff's consent, to request a three-week adjournment—from May 20, 2024 until June 10, 2024—of the deadline for Defendants to file their motion for summary judgment, as well as an attendant adjustment of the rest of the briefing schedule, as set forth below.

Pursuant to the Order issued on March 6, 2024 (ECF No. 60), Defendants' motion for summary judgment is presently due on May 20, 2024. Defendants have been diligently working on their papers, but require additional time given the expansive factual record in this case. The parties produced thousands of pages of documents and conducted nine depositions. Defendants require extra time to fully analyze and address this factual record in their opening brief, supporting declarations, and Rule 56.1 statement of undisputed facts. This case also implicates a number of individualized legal questions that need to be researched and briefed separately.

For these reasons, Defendants respectfully request that the deadline to file their summary judgment papers be extended by three weeks, from May 20, 2024 until June 10, 2024. Defendants further request an attendant modification of the remainder of the briefing schedule, pursuant to which the deadline for Plaintiff to oppose the motion would move from June 20, 2024 until July 19, 2024, and the deadline for Defendants to reply would move from July 2, 2024 until August 2, 2024.

This is Defendants' first request for an extension of the summary judgment schedule, and Plaintiff consents to the revised schedule proposed herein.

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Thank you for your time and consideration of this request.

Respectfully submitted,

/s/ Matthew J. Lawson

Matthew J. Lawson

Assistant Attorney General